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Patterson Schafer, Incorporated



February 20, 1989

Mr. Sandy A. Silverstein, Manager Energy & Environmental Affiars Cerro Copper Products Company P.O. Box 681 East St. Louis, IL 62202

Dear Sandy:

I enclose a copy of the recently proposed "second-third" hazardous waste land ban regulations. You may want to review them to ensure that they do not address any waste currently being land disposed by Cerro. Also of interest is Section 6 on page 1943. The discussion has a certain parallel with our zero discharge problem, although the remedy suggested in this Section is apparently not available to us except through the Fundamentally Different Factors option.

Cordially yours,

James W. Patterson, Ph.D.

JWP/mh 880012.1

cc: Paul Tandler

Enclosure: